

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In Re)

)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
Murrieta, CA)

MM Docket

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To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

Helen Jones, by her attorney, hereby petitions for amendment of Section 73.202(b) of the Commission's Rules to assign Channel 281A for use at Murrieta, California, as that community's first FM channel.

Attached hereto is an Engineering Statement prepared by the consulting engineering firm of Hatfield & Dawson which establishes that Channel 281A can be assigned for use at Murrieta in compliance with the Commission's rules relating to channel separation and community coverage using a reference site located approximately 5.2 km east of Murrieta. The Engineering Statement also establishes that, although the proposed allotment is short spaced to Station XHBA, Channel 281C, Mexicali, BN, Mexico, operation of the proposed Murrieta station will not result in any actual interference to Station XHBA and, thus, the allotment is permitted under the Agreement between the United States and Mexico relating to FM broadcast service.

Murrieta is an incorporated community with a population (1999 est.) of approximately 41,500. As such, it clearly

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qualifies as a community that is entitled to its own FM allotment.

If Channel 281A is assigned to Murrieta, Helen Jones will file an application for the channel and if her application is granted, she will promptly construct a station at Murrieta.

Respectfully submitted,

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Attorney for Helen Jones

Date: October 5, 2000

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 281A
FOR USE AT MURRIETA, CA

HELEN JONES

SEPTEMBER 2000

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Helen Jones in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to assign Channel 281A for use at Murrieta, CA.

As outlined in the attached channel study, Channel 281A can be assigned for use at Murrieta in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study a suitable site has been located on a hilltop 5.2 km east of Murrieta. The coordinates of this site are N 33° 32' 55" W 117° 09' 26". The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Murrieta.

While the proposed allocation meets the spacing requirements to all domestic stations, it is short-spaced to XHBA Channel 281C Mexicali, BN, Mexico. Per the *Agreement Between the Government of the United States of America and the Government of the United Mexican States Relating to the FM Broadcasting Service in the band 88-108 MHz* a "Restricted Assignment" may be granted to stations not meeting the minimum separation assignments, provided it can be shown that the proposed assignment will not cause interference to the protected station. Section 3 of the

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Agreement lists the maximum distance to the protected (60 dB μ) contour for a Class C station as 92 km. As shown by the attached map, the proposed operation of Channel 281A at Murrieta with maximum Class A facilities (defined as Class AA in the Agreement) will not result in any overlap between the 40 dB μ (F 50,10) contour from the proposed allotment and the protected 60 dB μ contour of XHBA.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :Murrieta

Separation Buffer 50 km

Channel 281A (104.1 MHz)

Coordinates : 33-32-55 117-09-26

| Call | City | Channel | ERP(kW) | Latitude | Bearing | Dist. | Req. |
|---|-------------------|--------------|---------|----------|-----------|---------|--------------|
| Status | State | FCC File No. | Freq. | HAAT(m) | Longitude | deg-Tru | (km) |
| K228AJ | Victorville, etc. | 228D | .105 | DA | 34-14-03 | 1.2 | 76.07 0 |
| LIC | CA | BLFT860522TA | 93.5 | 1258.0 | 117-08-25 | | .00 TRANS |
| TRANSLATOR FOR KFRG, SAN BERNARDINO, CA. | | | | | | | |
| | Thermal | 278A | | | 33-38-42 | 83.2 | 94.88 31 |
| PADD | CA | RM9540 | 103.5 | .0 | 116-08-30 | | 63.88 CLEAR |
| Accepted by Mexico as AA on 990826 (Mexico) | | | | | | | |
| KOST | Los Angeles | 278B | 12.5 | | 34-13-32 | 312.2 | 112.62 69 |
| LIC | CA | BLH930831KD | 103.5 | 949.0 | 118-03-52 | | 43.62 CLEAR |
| Proposed to Mexico as C 910610-Accepted by Mexico 911015 | | | | | | | |
| KPLN | San Diego | 279B | 36. | | 32-50-21 | 186.2 | 79.16 69 |
| LIC | CA | BLH5061 | 103.7 | 177.0 | 117-14-57 | | 10.16 CLOSE |
| Proposed to Mexico as C on 910620-Accepted by Mexico 920228 | | | | | | | |
| KCXX | Lake Arrowhead | 280A | 0.18 | | 34-14-03 | 1.2 | 76.07 72 |
| LIC | CA | BLH960502KA | 103.9 | 548.0 | 117-08-25 | | 4.07 CLOSE |
| Accepted by Mexico as Class B 910917 | | | | | | | |
| K280CV | Cathedral City | 280D | .250 | DA | 33-52-12 | 61.9 | 76.38 0 |
| LIC | CA | BLFT950816TC | 103.9 | 429.0 | 116-25-43 | | .00 TRANS |
| Translator for KROR, Yucca Valley, CA. | | | | | | | |
| Vertical Polarization Only | | | | | | | |
| K280CV | Cathedral City | 280D | .250 | DA | 33-52-12 | 61.9 | 76.38 0 |
| CP | CA | BPFT980106TG | 103.9 | 432.0 | 116-25-43 | | .00 TRANS |
| Translator for KROR, Yucca Valley, CA. | | | | | | | |
| XHBAFM | Mexicali | 281C | 100. | | 32-34-15 | 123.9 | 192.79 226 |
| | BN | 104.1 | 40.0 | | 115-26-55 | | -33.21 SHORT |
| | Ensenada | 281B | | | 31-51-20 | 165.3 | 194.46 178 |
| | BN | 104.1 | .0 | | 116-38-09 | | 16.46 CLEAR |
| KBIGFM | Los Angeles | 282B | 105. | | 34-13-36 | 312.2 | 112.84 113 |
| LIC | CA | BLH960917KC | 104.3 | 882.0 | 118-03-59 | | -.16 SHORT |
| Grandfathered at 105kw @ 882m HAAT. | | | | | | | |
| Proposed to Mexico as C 910503-Accepted by Mexico 910917 | | | | | | | |

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Seattle, WA

FM SEPARATION STUDY

Job Title :Murrieta

Separation Buffer 50 km

Channel 281A (104.1 MHz)

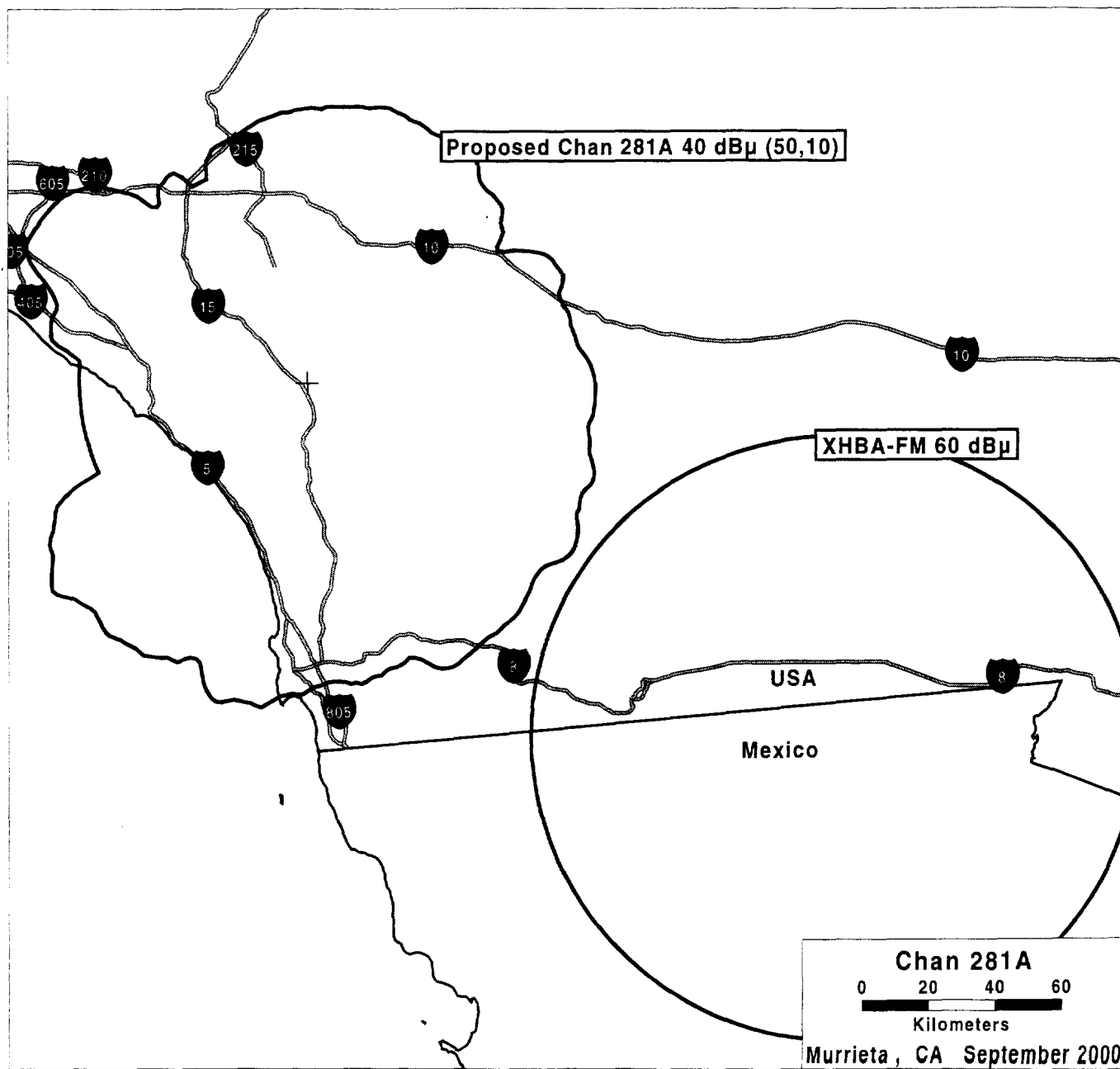
Coordinates : 33-32-55 117-09-26

| Call | City | Channel | ERP(kW) | Latitude | Bearing | Dist. | Req. |
|---------|--------------|--------------|---------|-----------|-----------|---------|-----------|
| Status | State | FCC File No. | Freq. | HAAT(m) | Longitude | deg-Tru | (km) (km) |
| XHLTNFM | Tijuana | 283B | 57.3 | 32-31-25 | 173.1 | 114.80 | 69 |
| | BN | 104.5 | 107.0 | 117-00-35 | | 45.80 | CLEAR |
| KDESFM | Palm Springs | 284B | 42.0 | 33-51-56 | 62.0 | 75.67 | 69 |
| LIC | CA | BLH7536 | 104.7 | 165.0 | 116-26-04 | 6.67 | CLOSE |

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** End of separation study for channel 281A **

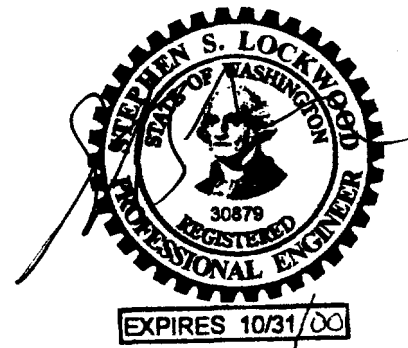
Hatfield & Dawson Consulting Engineers



CERTIFICATION

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to specify Channel 281A for use at Murrieta, California has been prepared on behalf of Helen Jones. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Alaska.

September 18, 2000



Stephen S. Lockwood, P.E.

Hatfield & Dawson Consulting Engineers